SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

1440 NEW YORK AVENUE, N.W. WASHINGTON, D.C 20005-2111

> TEL (202) 371-7000 FAX (202) 393-5760 http://www.skadden.com

DIRECT DIAL (202) 371-7007 DIRECT FAX (202)371-7956

August 30, 2001

Via Fax and First Class Mail

Kim C. Stevenson, Esq. Office of the General Counsel Federal Election Commission 999 E Street, NW Washington, D.C. 20463

Re:

MUR 5225 - Stan Lee

Dear Ms. Stevenson:

This is a request on behalf of Stan Lee, in his individual capacity, for an extension of time to respond to a letter from the Federal Election Commission ("FEC" or "Commission"), which was received on August 27, 2001, notifying him of a complaint filed by Judicial Watch and its client, Peter F. Paul. We have already forwarded to you a completed Designation of Counsel Form.

The complaint was not properly filed in that it was not "sworn to and signed in the presence of a notary," as required under FEC rules. 11 C.F.R. § 111.4(b)(2). Rather, the complaint was merely declared "under the penalty of perjury." Please note that the complaint would be submitted under the penalty of perjury regardless of whether the complainant expressly affirms it in the complaint. Moreover, it is not clear that the complaint was properly notarized. The complaint appears to have been signed in Brazil, and the stamp placed under the signature line is in Portuguese, which we cannot translate.

Regardless of the complaint being defective, Mr. Lee may still submit a response. However, we will need an extension of thirty (30) days to submit this response. This extension is necessary given that Mr. Lee has just retained us as counsel to represent him in this matter and we will need time to review the underlying facts. The time for responding also spans vacation schedules and travel in

FIRM/AFFILIATE OFFICES BOSTON CHICAGO HOUSTON LOS ANGELES NEWARK NEW YORK PALO ALTO RESTON SAN FRANCISCO WILMINGTON BEIJING BRUSSELS FRANKFURT HONG KONG MOSCOW PARIS SINGAPORE TOKYO TORONTO

Kim C. Stevenson, Esq. August 30, 2001 Page 2

connection with other cases. In addition, Mr. Lee resides in California and some time will be needed to ensure that all appropriate documents are reviewed.

According to the Commission's letter, the original due date is September 11, 2001. If the thirty (30) day extension is granted, the new due date will be October 11, 2001.

Thank you for your consideration of this request.

Ki P. Hong

Sincerely,